IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
vs.)	Criminal Case No. 1:06-cr-170-WHA
)	
SONYA PITTMAN)	

MOTION FOR TEMPORARY RELEASE

COMES NOW Defendant in the above-styled cause and moves the Court for leave to temporarily leave her home in order to have her 2006 tax return prepared, and in support of which would show as follows:

- 1. Defendant is presently on home incarceration and is permitted to leave her residence only for court appearances, attorney conferences, proffer meetings, and the like.
- 2. Defendant has been unable to procure a tax preparer to come to her home, and she believes herself incapable of preparing her tax return alone.
- Counsel has conferred with Defendant's pretrial release officer who confirms that an
 Order of the Court is required for the effectuation of the above purpose.

WHEREFORE, the premises considered, Defendant prays that the Court will permit her to leave her home at a time and for a period to be arranged between her and her probation officer for the limited purpose of having her tax return prepared.

RESPECTFULLY SUBMITTED, this __2nd__ day of February, 2007.

/s/ JAY LEWIS
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ASB-2014-E66J Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

A. Clark Morris Office of the United States Attorney One Court Square, Suite 201 Montgomery, AL 36104

> /s/ JAY LEWIS Law Offices of Jay Lewis, L.L.C. P.O. Box 5059 Montgomery, Alabama 36103 (334) 263-7733 (Voice) (334) 832-4390 (Fax) J-Lewis@JayLewisLaw.com ASB-2014-E66J Attorney for Defendant